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U.S. EPA Region IV
TES VIII Contract, WA No. C04029
Carrier Air Conditioning Site

Project No. 45256.001
April 12, 1990

Ms. Beth Brown
U.S. EPA Region IV
345 Courtland Street, NE
Atlanta, GA 30365

Dear Ms. Brown,

We have completed our review of the PRP Draft Phase I Remedial Investigation/Feasibility Study (RI/FS) Report for the Carrier Air Conditioning site in Collierville, Tennessee. This letter report presents our comments and is responsive to Task 3 as identified in the Work Plan for this Work Assignment (No. C04029). The comments are catagorized as either general or specific.

General

1. It is agreed that TAL metals analysis should be conducted during Phase II sampling. The additional monitor wells that Ensafe proposes to provide background information on metals should be placed away from and not downgradient of industrial groundwater pollution sources.

2. Analytical data from the organic-free water sample taken from the tap at the decontamination pad is not presented. Field notes indicate that this sample was taken on 1/23/90.

3. The Work Plan/Sampling Plan indicates that the groundwater flow in the lower aquifer is to the northwest. Has any flow direction been established for the shallow/perched aquifer?

4. What are the depths of the two City of Collierville wells?

5. The PRP's conclusion that semi-volatiles, pesticides, and PCB's are not site-specific constituents appears to be reasonable.

6. TCE and its degradation products are identified as site constituents. Whether or not volatile organic compounds identified in some of the samples are site constituents should be resolved in subsequent sampling efforts.

7. Groundwater data from previous investigations appear to correlate with the Phase I analytical data, based on the information provided in the draft Phase I RI/FS Report.

Specific Comments

1. Page 9, Paragraph 1: It is stated that fourteen (14) groundwater samples in addition to samples from the two (2) municipal wells were collected. The analytical data presented in Appendix B is for thirteen (13) groundwater samples in addition to the samples from the two (2) municipal wells. This should be clarified.

2. Page 9, Paragraph 3: Footnote one makes reference to the fact that sufficient sample could not be obtained from each well. It would be helpful to the reader, if a table was inserted in the report that lists the wells sampled, the dry wells and the wells which produced insuffient groundwater for complete TCL/TAL analyses.

3. Page 11, Paragraph 2: The four samples delayed in transit are stated to have been extracted and analyzed within holding time requirements. It is not stated whether or not the samples remained at the appropriate temperature when they were removed from the coolers. This should be clarified.

4. Page 16, Paragraph 1: The presence of methylene chloride is considered to be the result of laboratory contamination and the presence of acetone is questionable. It is recognized that methylene chloride and acetone

are ubiquitous laboratory contaminants; however, is there any known use of either methylene chloride or acetone in the past at the Carrier Air Conditioning facility?

5. Page 19, Paragraph 3: It would be helpful to review water-level data for the shallow wells to determine how much, if any, water in the water column is in contact with the galvanized steel casing. It is unclear, after reviewing the Work Plan, whether or not a segment of the riser pipe above the stainless steel screen is constructed of stainless steel. This may be useful in evaluating the effect that the galvanized casing may have on zinc concentrations.

6. Page 26, Table 1: Several soil samples (e.g. B40-2) analyzed by CLP have TCE concentrations indicating BDL while the Woodson-Tenent screening method indicates higher concentrations. In addition, it was observed upon reviewing the borehole logs that several soil samples (e.g. B40-2) screened in the field using an HNu PID had volatile organic concentrations in the ppm range and in these samples TCE was also detected using the Woodson-Tenent screening method. It appears that the Woodson-Tenent screening method correlates better with the field PID screening than it does with the CLP data. It is possible that the Woodson-Tenent screening method may be more representative of actual TCE concentrations.

7. Page 29, Summary: Is EnSafe proposing to analyze <u>all</u> soil samples taken in Phase II using both CLP and the Woodson-Tenent methods or will only one soil sample per borehole be analyzed by CLP as specified in the Work Plan?

8. Appendix B: Detection limits are high for some volatile organics because of the dilution factor for contaminated soils. Can data be presented that shows lower detection limits to provide better assurance that these compounds are not present?

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These comments conclude our review of the draft Phase I RI/FS report. If you have any questions or comments, do not hesitate to call me at (404) 392-9227.

Very truly yours,
B&V Waste Science and Technology

Robert Marbury,
Work Assignment Manager

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cc: Jane Penny, DYNAMAC